

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSINU.S. DISTRICT COURT
EASTERN DISTRICT WI
FILED

UNITED STATES OF AMERICA,

2015 JAN 20 P 3 10

Plaintiff,

Case No. 15-CR-^{JOHN A. SANFILIPPO}
CLERK

v.

JOSEPH J. VALDEZ,

Green Bay Division

Defendant.

15 -CR-013

INDICTMENT

COUNT ONE

(Sexual Exploitation of a Child)

THE GRAND JURY CHARGES THAT:

On or about December 1, 2013, in the State and Eastern District of Wisconsin and elsewhere,

JOSEPH J. VALDEZ

knowingly employed, used, persuaded, induced, enticed or coerced known Minor Female A to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: a visual depiction of known Minor Female A engaged in the lascivious exhibition of her genitals, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT TWO

(Sexual Exploitation of a Child)

THE GRAND JURY FURTHER CHARGES THAT:

On or about December 9, 2013, in the State and Eastern District of Wisconsin and elsewhere,

JOSEPH J. VALDEZ

knowingly employed, used, persuaded, induced, enticed or coerced known Minor Female B to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: a visual depiction of unknown Minor Female B engaged in the lascivious exhibition of her genitals, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT THREE

(Sexual Exploitation of a Child)

THE GRAND JURY FURTHER CHARGES THAT:

On or about January 20, 2014, in the State and Eastern District of Wisconsin and elsewhere,

JOSEPH J. VALDEZ

knowingly employed, used, persuaded, induced, enticed or coerced unknown Minor Female C to engage in sexually explicit conduct for the purpose of producing a visual depiction of such conduct, to wit: a visual depiction of known Minor Female C engaged in the lascivious exhibition of her genitals, which visual depiction was produced using materials that had been mailed, shipped, and transported in interstate or foreign commerce by any means, including by computer, and which visual depiction was transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce.

All in violation of Title 18, United States Code, Section 2251(a).

COUNT FOUR

(Possession of Child Pornography)

THE GRAND JURY FURTHER CHARGES:

1. On or about January 27, 2014, in the State and Eastern District of Wisconsin,

JOSEPH J. VALDEZ

knowingly possessed matter that contained images of child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), that had been mailed, shipped, and transported using a means and facility of interstate and foreign commerce, and that was produced using materials that had been mailed, shipped, and transported by a means of interstate and foreign commerce, including by computer.

2. The child pornography possessed by the defendant included videos and images identified by the following partial file names:

Partial File Name	Description
f5ec6856-b63b-4b4e-a4a382fde0118993.jpg	The image depicts a naked minor female with breast and genitals exposed as the focus of the image and her face obscured by a cellular telephone.
d9c284eb2b87a8fe5594e242a3c905bf.jpg	The image is focused solely on the genital area of a minor female.
8707be01-cd2b-486b-a370-763618122283.jpg	The image depicts the genital area of a minor female with a toothbrush protruding from her vagina.
20131221_233707.jpg	The image depicts a downward photograph of a known minor female's torso with the focus on her genitals.

All in violation of Title 18, United States Code, Section 2252A(a)(5)(B).

A TRUE BILL:

FOREPERSON

Dated: 1-20-2015

Gregory J. Hanke

~~JAMES L. SENTELLE~~
United States Attorney